

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

July 2024 GRAND JURY
(Impaneled July 26, 2024)

THE UNITED STATES OF AMERICA **INDICTMENT**

-vs-

TERRANCE CISZEK, a/k/a DrMonster

Violations:

Title 18, United States Code,
Sections 1029(a)(3) and 1001(a)(2)
(3 Counts and Forfeiture Allegation)

INTRODUCTION

The Grand Jury Charges That:

At all times relevant to this Indictment:

1. The defendant, TERRANCE CISZEK, a/k/a DrMonster, was employed by the Buffalo Police Department. At all times relevant to this Indictment, the defendant was located within the Western District of New York.

2. Genesis Market (“Genesis”) was an online marketplace that sold stolen data—such as computer and mobile phone identifiers, email addresses, usernames, and passwords—from malware-infected computers. Genesis allowed its users to purchase “bots,” which typically represented data stolen from a particular victim device. Some of the bots sold on Genesis included a digital “fingerprint.” A fingerprint was a group of identifiers from a device that third-party applications or websites often use to validate or authenticate a computer or

device. In situations where a fingerprint was associated with a bot, Genesis provided the purchaser with a proprietary plugin—that is, an internet browser extension that provided additional functionality. This proprietary plugin enhanced the purchaser’s ability to control and access the bot’s data and masquerade as the victim device. At all times relevant to this Indictment, Genesis’ backend servers, though which data was transferred for Genesis transactions, were located outside the United States.

3. UniCC was a Russian-based dark web site that sold stolen payment card data.

4. The defendant, TERRANCE CISZEK, a/k/a DrMonster, maintained cryptocurrency accounts at Coinbase and CashApp. When he created his accounts at Coinbase and CashApp, the defendant provided, respectively, his Buffalo Police Department identification card and his driver’s license to confirm his identity.

5. On or about March 16, 2020, the defendant, TERRANCE CISZEK, a/k/a DrMonster, accessed his CashApp account from IP address 67.252.42.6.

6. On or about March 16, 2020, the IP address 67.252.42.6 was used to access a Genesis account for a user named DrMonster.

7. On or about March 19, 2020, the defendant, TERRANCE CISZEK, a/k/a DrMonster, initiated two separate bitcoin transactions from his CashApp account to another bitcoin wallet (“the Passthrough Wallet”). The defendant then transferred bitcoin from the Passthrough Wallet to DrMonster’s Genesis account.

8. Between on or about March 19, 2020, and on or about April 21, 2020, the defendant, TERRANCE CISZEK, a/k/a DrMonster, purchased 11 bots from Genesis. Those bots contained approximately 194 stolen credentials. The defendant generated “fingerprints” for four of the bots he purchased.

9. On or about March 30, 2020, the defendant, TERRANCE CISZEK, a/k/a DrMonster, advertised a Genesis invitation for sale on the online messaging service Telegram.

10. On or about, April 15, 2020, the exact date being unknown, the defendant, TERRANCE CISZEK, a/k/a DrMonster, recorded a video explaining to others how he anonymized his identity on the internet when purchasing stolen credit cards. In his video, the defendant also described his use of UniCC. In the video, the defendant stated, among other things, “And then I usually get my credit cards from UniCC, which is an amazing place if you guys don’t have it. And I usually get my socks from Luxsocks. And just do your thing. That’s pretty much it. You guys got any questions just text me.” In the video, the defendant then displayed a login page for UniCC.

11. On or about July 29, 2020, the defendant, TERRANCE CISZEK, a/k/a DrMonster, downloaded Genesis’ proprietary web browser to his computer.

12. On multiple dates in July 2020, the defendant, TERRANCE CISZEK, a/k/a DrMonster, visited UniCC from his computer.

COUNT 1

(Possession of Unauthorized Access Devices with Intent to Defraud)

The Grand Jury Further Charges That:

13. The allegations of the Introduction of this Indictment are realleged and incorporated by reference as though fully set forth herein.

14. Between on or about March 19, 2020, and on or about August 22, 2020, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, TERRANCE CISZEK, a/k/a DrMonster, knowingly and with intent to defraud, possessed more than fifteen unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), that is, stolen login credentials and payment card data, said possession affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 1029(a)(3).

COUNT 2

(False Statement to an Agency of the United States)

The Grand Jury Further Charges That:

15. The allegations of the Introduction of this Indictment are realleged and incorporated by reference as though fully set forth herein.

16. On or about April 4, 2023, in the Western District of New York, the defendant, TERRANCE CISZEK, a/k/a DrMonster, in a matter within the jurisdiction of the executive branch of the United States, did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations to Special Agents of the Federal Bureau of

Investigation, in that the defendant stated that he had not purchased stolen credentials from the internet, whereas in truth and in fact, and as the defendant then and there well knew, the defendant had purchased stolen credentials from Genesis and UniCC.

All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 3

(False Statement to an Agency of the United States)

The Grand Jury Further Charges That:

17. The allegations of the Introduction of this Indictment are realleged and incorporated by reference as though fully set forth herein.

18. On or about April 4, 2023, in the Western District of New York, the defendant, TERRANCE CISZEK, a/k/a DrMonster, in a matter within the jurisdiction of the executive branch of the United States, did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations to Special Agents of the Federal Bureau of Investigation, in that the defendant stated that his nephew may have been responsible for the online purchase of stolen credentials, whereas in truth and in fact, and as the defendant then and there well knew, the defendant was responsible for such purchases.

All in violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE ALLEGATION

The Grand Jury Further Alleges That:

19. Upon conviction of Count 1 of this Indictment, the defendant, TERRANCE CISZEK, a/k/a DrMonster, shall forfeit to the United States any personal property used or intended to be used to commit the offense, including, but not limited to the following property seized by law enforcement on April 4, 2023:

ELECTRONICS:

- i. One (1) SanDisk 64 GB thumb drive;
- ii. One (1) Samsung 32 GB thumb drive;
- iii. One (1) Samsung Galaxy S7 Edge bearing IMEI number 356164071795656;
- iv. HP ProBook Model 450 G7 Laptop bearing serial number 5CD028GFP7;
- v. One (1) TM9252 SIM card bearing ICCID number 8901260391786898014630060;
- vi. One (1) HP Envy desktop computer bearing serial number 4CE130YZ3Q; and
- vii. One (1) Samsung cellular device.

All pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

DATED: Buffalo, New York, October 16, 2024

TRINI E. ROSS
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A TRUE BILL:

S/FOREPERSON
FOREPERSON